



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604**

DATE: FEB 15 2018

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
River City Diesel, LLC, East Peoria, Illinois

FROM: Sarah Clark, Environmental Engineer
AECAB (IL/IN)

THRU: Nathan Frank, Section Chief
AECAB (IL/IN)

TO: File

BASIC INFORMATION

Facility Name: River City Diesel, LLC (RCD)

Facility Location: 1360 Spring Bay Rd, East Peoria, Illinois, 61611

Date of Inspection: January 11, 2018

EPA Inspectors:

1. Sarah Clark, Environmental Engineer
2. Ethan Chatfield, Environmental Engineer

Other Attendees:

1. Josh Davis, Owner, RCD (josh@rivercitydiesel.com)

Purpose of Inspection: Clean Air Act (CAA) mobile source inspection

Facility Type: Motor vehicle and engine parts retail store

Regulations Central to Inspection: CAA 203(a)(3) "The following Acts are prohibited – (B) for any person to manufacture or sell, or offer to sell, or install, any part or component intended for use with, or as part of, any motor vehicle or motor vehicle engine, where a principal effect of the part or component is to bypass, defeat, or render inoperative any device or element of design installed on or in a motor vehicle or motor vehicle engine in compliance with regulations under this subchapter, and where the person knows or should know that such part or component is being offered for sale or installed for such use or put to such use."

Arrival Time: 11:00 AM

Departure Time: 12:40 PM

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Credentials Presented
- ☒ CBI warning to facility provided

The following information was obtained verbally from Mr. Davis unless otherwise noted.

Process Description:

According to Mr. Davis, RCD manufactures aftermarket replacement parts for engines, such as connecting rods, pistons, and cylinder heads that are used in racing applications such as tractor- and truck-pull competitions. RCD shares a location with a NAPA Auto Parts, River City Machine, and until recently, Midwest Truck.

Staff Interview:

At 11:00 AM, EPA inspectors entered the main entrance off of County Rd 1350 N which appeared to lead to a NAPA Auto Parts store. Tim Twardowski, the Operations Manager, greeted us at the counter and stated that this location was also RCD. We introduced ourselves and presented our credentials. Then, we met Darrin Caho, another manager from the sales team. We were informed that the owner was not on site, and that we should wait in the waiting room for one of the managers to meet us. When Mr. Davis arrived, he clarified that he was the owner but that he was recovering from the flu. We presented our credentials and delivered a Small Business Fact Sheet to Mr. Davis. Mr. Davis explained that he is aware of EPA's efforts regarding tampering and recently spoke with an EPA representative at a trade show.

According to Mr. Davis, RCD no longer operates a repair garage (Midwest Truck) since the service manager accepted a position with another company around August/September 2017. The garage consisted of only labor, no inventory. There are about 10-12 employees at this location spread among the different businesses. Mr. Davis explained that River City started remanufacturing parts around 2009/2010 and that the business split into separate entities around 2013. Mr. Davis stated that his company was a Bosch Diagnostic Center (BDC) prior to 2009/2010. Mr. Davis informed us that the website "www.rivercitydiesel.com" has not been updated since about 2012/2013, and since the hosting has expired, the RCD staff cannot access the site. Mr. Davis claimed that RCD does no advertising and relies on 'basic local work,' that sales are currently conducted over the phone or in person, and that the majority of sales are to individuals. Mr. Davis said that RCD uses Quickbooks to track sales. When asked whether RCD manufactures anything to replace emission control components, such as diesel particulate filters (DPFs) or exhaust gas recirculation systems (EGRs), Mr. Davis responded that RCD does not

have the tuning capabilities to do that. Mr. Davis stated that his store sells SCT Derive systems (plug-ins), but they are emissions compliant and are used not for deleting any emission controls. Mr. Davis stated that his company makes engine parts, primarily pistons, rods, cams, cylinders, etc. He stated that the NAPA store sells only basic auto parts, not RCD; RCD sells “emission compliant” tuners, including Derive SCT tuners. Mr. Davis admitted that RCD did sell tuners, delete parts back in the 2000’s, but that was “before the EPA pinch” and they no longer sell any of those parts. Mr. Davis stated that RCD has not conducted any emissions testing on their products. RCD includes a disclaimer for parts that are intended for ‘off-road use only,’ and that RCD does not require customers to sign any kind of agreement or release pertaining to off-road parts. The disclaimer was due to a letter received from CARB many years prior. Mr. Davis informed us that RCD does not conduct heavy-duty diesel engine work or sell parts for heavy-duty diesel engines.

TOUR INFORMATION

EPA toured the facility: Yes

Data Collected and Observations:

Mr. Davis initially denied entry to EPA for the tour. We informed Mr. Davis of the procedure we would likely follow if denied access. Mr. Davis excused himself to make a phone call. During this time, while we were waiting in the conference room, we observed a framed “Positive Reference Letter” displayed on the windowsill dated August 29, 2014. The letter was written by a customer who self-identified as a “recent owner of a 2008 F350 Lariat 6.4 Diesel” that was ‘left bone stock’ by the original owner; the customer expressed interest in increasing his truck’s fuel mileage. The letter detailed this customer’s experience with RCD in which the customer ordered a “450 horsepower tune from RCD with a SCT tuner and an Edge Insight CTS for monitoring gauges.” The letter stated that the customer’s unidentified ‘local shop’ then “installed a larger exhaust, cold air intake and made EGR adjustments. They also loaded the proper RCD performance tune and mounted the Edge system.”

When he returned, Mr. Davis stated that he had changed his mind and was now willing to grant EPA access. We informed Mr. Davis that it would be necessary for EPA to take photos during the inspection but we could send a copy of all the photos taken to him, if he would like. He then led us to the warehouse attached to the NAPA store. Mr. Davis expressed concern that he did not want anyone to lose their job.

During the tour, we observed a number of tuners, including performance-enhancing tuners, tuner accessories, turbos, crank cases, and delete kits for EGRs and DPFs; our observations are documented in Appendix A: List of Observed Products. The tuner and tuner-accessory brands we observed included BD, Bully Dog, Drew Technologies, Edge, Pacific Performance Engineering, Patriot Diagnostics, RaceMe, SCT, Spartan, Smarty, and Street Diesel Performance. Mr. Davis initially watched us take photos and stated a few times that these tuners were older stock items that have not been sold for a long time and that he did not even know that these items were still on the shelf.

We observed dozens of RCD-brand boxes lining the shelves. Again, Mr. Davis stated that these were older stock items. After receiving permission from Mr. Davis to open the boxes, we found what appeared to be EGR delete kits for various engine models. Two of the boxes we opened contained instruction manuals with the following titles: "2011-2014 Ford 6.7L Power Stroke EGR Delete," and "Duramax LMM EGR Delete". After some time, Mr. Davis held back and eventually disappeared for a period of time without a word to EPA inspectors.

We observed a box with a label for a crank case by Sinister Diesel. We observed several cardboard boxes advertising Garret by Honeywell turbos complete with matching UPC codes as well as four similar boxes that appeared to be re-taped and relabeled with RCD-brand codes.

We photographed an invoice dated January 9, 2018 for a "Race Me Race Tuner 2010-2011 6.7 Cummins" and a "2007.5-2012 Dodge Ram HD 2500/3500 4" Turbo Black 409 Stainless CAT/DPF Delete Pipe".

We observed stacks of straight pipes labeled as "RCD-6.4 DPF DEL Lower 409". We observed a box labeled as a "Flo-Pro Performance Exhaust 07-10 GM CAT Race Pipe" and what appeared to be a straight-pipe on top of a box labeled as "RCD-6.7C 49-42023". Finally, we observed a box with the following label: "ATLAS Exhaust Race Pipe 4" Aluminized Steel Race Pipe".

At approximately 12:32 PM, after EPA inspectors had spent approximately 37 minutes in the warehouse, Mr. Davis returned to the warehouse and stated that we needed to leave immediately. We promptly ceased our activities and followed Mr. Davis back to the waiting room.

Photos and/or Videos: were taken during the inspection.

Photos were claimed as Confidential Business Information (CBI), so see CBI attachment for Digital Image Log.

Field Measurements: were not taken during this inspection.

CLOSING CONFERENCE

We held a brief closing conference in the same room as the opening conference. When we asked Mr. Davis if he would like to review our photographs, he declined; however, he requested that the photographs be claimed as CBI. When we asked Mr. Davis if there was any further information he would like to share, he declined. We exited the facility at 12:40 PM.

SIGNATURES

Report Author: Sarah Clark Date: 1-24-2018

Section Chief: [Signature] Date: 2/15/18

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APPENDICES AND ATTACHMENTS

1. **Appendix A:** List of Observed Products
2. **CBI Attachment:** Photo CD-R and Digital Image Log

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APPENDIX A: LIST OF OBSERVED PRODUCTS

Inspectors were unable to quantify all products during the brief tour; only products for which inspectors were able to confidently estimate are listed under the column "Approximate Quantity Noted During Inspection." The rest are labelled with an asterisk (*).

Brand Name	Product Name	Function	Approximate Quantity Noted During Inspection
BD	Diesel Performance Boost/EBP Fooler 99-03 7.3L 1057020	Tuner/Tuner accessories	2
Bully Dog	GT Platinum Gas	Tuner/Tuner accessories	*
	42214 Dodge Cummins 13-16 Unlock Cable		2
Drew Technologies	DashDAQ-XL	Tuner/Tuner accessories	1
Edge Products	16030 Ford EVO HT Diesel & Gas Vehicles	Tuner/Tuner accessories	*
	85200 Diesel Evolution CTS		*
	84132 Insight CTS2 with Unlock Cable		*
	Juice Attitude Dodge 03-04 5.9L Common Rail		*
	84130 Insight CTS2		*
Pacific Performance Engineering	Xcelerator 111010000	Tuner/Tuner accessories	1
	Xcelerator 111020000		1
Patriot Diagnostics	PAT 6.7 SOTFC	Tuner/Tuner accessories	2
RaceMe	Pro Dodge 24V-6.7L Cummins Turbo Diesel Common Rail	Tuner/Tuner accessories	*
SCT	7015 (Ford)	Tuner/Tuner accessories	*
	Livewire TS+		*
	BDX Performance Programmer		*

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	GTX Performance Programmer and Monitor 404805		8
Smarty	S06 PoD CaTCHER Software Dodge 24V Cummins Turbo Diesel 5.9L-Common Rail		*
	S03 CaTCHER Software Dodge 24V-5.9L Cummins Turbo Diesel 1998-2002		*
Spartan	6.7 NGAUGE	Tuner/Tuner accessories	22
Street Diesel Performance	31305 13-16 Ford Powerstroke	Tuner/Tuner accessories	*
RCD	RCD-6.6 LMLEGRK	EGR Delete Kit	37
	RCD-6.7 EGRK 2011-2014		51
	RCD-6.7 EGRK15-16		6
	RCD-6.7 FTEGRK17		7
	RCD-6.7C EGRK07-08		21
	RCD-6.6 LMMEGRK		*
	RCD ## LBZEGRK		*
	RCD ## LLYEGRK		*
	RCD-RCDMAX63.5	Unknown	2
	RCD-RCDMAX64.7		2
	RCD-6.4 DPF DEL LOWER 409	Straight pipe	Label read: "112 PCS" Observed 8 crates with an estimated 20 units each for approximately 160 units total. *
	RCD 6.7 49-42023	Potential straight pipe	

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Sinister Diesel	2006-2010 GM Duramax LBZ/LMM PCV/Crank Case LML Intake Bridge 2011+ GM Duramax	Crank case	*
Garrett by Honeywell	7#####-5003S, 725390- 5006S, 714792-5002S	Turbo	*
Flo~Pro	Performance Exhaust 10810 07-10 GM CAT RACE PIPE	Straight Pipe	*
ATLAS	Exhaust Race Pipe 4" Aluminized Steel Race Pipe 49-02050	Straight Pipe	*